

ORIGINAL

08 CRIM.

230

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

VICTOR ORTIZ,

Defendant.

SEALED INDICTMENT

08 Cr.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED MAR 11 2008

COUNT ONE

The Grand Jury charges:

1. In or about August 2007, in the Southern District of New York and elsewhere, VICTOR ORTIZ, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 1341 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that VICTOR ORTIZ, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, and having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and would and did knowingly cause to be delivered by mail according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is

addressed, such matter and thing, in violation of Title 18, United States Code, Section 1341.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about August 7, 2007, ORTIZ and other co-conspirators not named in this Indictment staged a car accident in the Bronx, New York.

(Title 18, United States Code, Section 1349.)

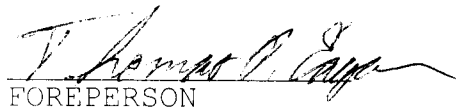
COUNT TWO

The Grand Jury further charges:

4. In or about August 2007, in the Southern District of New York and elsewhere, VICTOR ORTIZ, the defendant, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice to defraud and attempting so to do, would and did place and cause to be placed in authorized depositories for mail matter, matters and things to be sent and delivered by the Postal Service and deposited and caused to be deposited matters and things to be delivered by private and commercial interstate carriers, and did take and receive therefrom, such matters and things, and knowingly caused to be delivered by mail and such carriers according to the directions

thereon, such matters and things, to wit, ORTIZ and others participated in a staged automobile accident in the Bronx, New York, thereby causing various mailings to be sent from Manhattan, New York, to an insurance company, in connection with false insurance claims for personal injuries.

(Title 18, United States Code, Sections 1341 and 2.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

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Defendant.

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SEALED INDICTMENT

08 Cr.

(Title 18, United States Code, Sections  
1341 and 1349.)

MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

Thomas P. Egan  
Foreperson.

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2/16/09 Filed Indictment under Seal A/W issued.

SC

Pitman  
U.S.M.T.